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6 Attorneys for Plaintiff
7 United States of America

8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,) 2:20-po-00273-CKD
12 Plaintiff,) **STIPULATION AND PROTECTIVE**
13 v.) **ORDER RE: DISSEMINATION OF**
14 JESSICA L. JACKSON,) **HENTHORN MATERIALS**
15 Defendant.)
16) DATE: February 25, 2021
17) TIME: 9:00 a.m.
18) JUDGE: Hon. Carolyn K. Delaney
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IT IS HEREBY STIPULATED AND AGREED among the parties and their respective counsel, Alstyn Bennett, Special Assistant U.S. Attorney, counsel for plaintiff United States of America, and Linda Allison, counsel for defendant Jessica L. Jackson, that the documents that will be provided to defense counsel pursuant to *United States v. Henthorn*, 931 F.2d 29 (9th Cir. 1991) in this case are subject to limitations on dissemination as set forth herein. The parties respectfully request that the court order these limitations by signing this Stipulation and entering it on the record as a Protective Order applicable to all *Henthorn* material provided by the government to defense counsel in this case.

The parties agree that the *Henthorn* material in this case contains “Protected Information,” which is defined here as including the names, disciplinary actions, and conduct of a specific law enforcement officer involved in this case.

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STIPULATION AND [PROPOSED]
PROTECTIVE ORDER RE: DISSEMINATION
OF HENTHORN MATERIALS

1 Defense counsel agrees not to share any documents that contain Protected Information with
2 anyone other than defense counsel, designated certified student attorneys, and support staff at the
3 Federal Defender's office located in the Sacramento office of the Eastern District of California. Defense
4 counsel may permit the defendant to view the documents in the presence of her defense counsel,
5 designated certified student attorneys, and support staff, so long as defense counsel, designated certified
6 student attorneys, and support staff do not allow the defendant to copy or retain copies of the Protected
7 Information. In the event that the defendant substitutes counsel, undersigned defense counsel agrees to
8 withhold documents containing Protected Information from new counsel unless and until substituted
9 counsel agrees also to be bound by this Stipulation and [Proposed] Protective Order.

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12 DATED: February 24, 2021

McGREGOR W. SCOTT
United States Attorney

14 By: /s/ Alstyn Bennett
15 ALSTYN BENNETT
16 Special Assistant U.S. Attorney

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18 By: /s/ Linda Allison
19 LINDA C. ALLISON
20 Assistant Federal Defender
21 Attorney for Defendant
JESSICA L. JACKSON
(Per 02/24/2021 email authorization from Linda Allison)

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24 IT IS SO ORDERED.

25 Dated: February 24, 2021

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27 CAROLYN K. DELANEY
28 UNITED STATES MAGISTRATE JUDGE